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Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue, N.W.
Room H-135 (Annex P)
Washington, D.C. 20580

RE: 16 CFR Part 311 Comment – Recycled Oil Rule Matter No. R511036

This note provides the response of Exxon Mobil Corporation (ExxonMobil) to the July 6, 2006 Federal Register request for comment on the Federal Trade Commission (FTC) Test Procedures and Labeling Standards for Recycled Oil (16 CFR Part 311) that is part of a systematic, periodic review of all current FTC rules and guides.

Regarding the initial question posed in this request for comments, ExxonMobil believes that there is a continuing need for a rule such as this particular Rule. Although we do not offer here comments on each of the other eight questions posed by the FTC, ExxonMobil would be happy to discuss the broader issue of used oil management with the FTC at your convenience.

As general background, ExxonMobil is committed to work with its customers, governments, industry, and selected non-governmental organizations to help ensure the soundness of used oil management practices and to foster development of effective used oil laws and regulations based on sound science and considering risks, costs, and benefits

Since this Rule reinforces product performance standards for lubricants using recycled oil, ExxonMobil believes that it contributes to the goal of encouraging responsible used oil management practices to protect the public and the environment. This is why we believe that there is a continuing need for such a Rule.

In addition, ExxonMobil recommends reference to the most up-to-date edition of the American Petroleum Institute's Publication 1509 (currently Fifteenth Edition), rather than the reference to the Thirteenth Edition that is in the current Rule.

While, as mentioned, we do not comment here on the FTC's specific questions about benefits, drawbacks, or costs that the Rule has provided to or imposed on purchasers of products affected by the Rule, we recognize that the broader issue of used oil management is significant and complicated. Factors to be considered include maximizing collection of used oil, and free market determination of the appropriate disposition route for used oils, as well as concerns regarding toxicological differences or substantial equivalencies between virgin and recycled (re-refined) lubricant oils. (The complicated nature of the issue is represented in part by the Used Oil Management Diagram from the Earth911 WebSite that we include as an attachment.)

Thus, we would be pleased to discuss the general issue of used oil management if you would like. We thank you for the opportunity to comment on this FTC Rule

Sincerely,

Insert signatory

cc: Kevin Ferrick, API Lubricants Sub-committee

Used Oil Management - Terminology Diagram

